

With respect to the Commission's proposal to incorporate the IEC VHF-DSC Class 'D' standard as an alternative or a replacement to the RTCM SC-101 standard for DSC, I would like to take this opportunity to respectfully submit my comments. As a recreational boater who is also a professional engineer as well as having served in various capacities onboard warships, I recommend that IEC 62238 eventually replace the RTCM SC-101 standard for VHF digital selective calling as it is the superior standard.

Although many of the SC-101 radios I've seen are compliant with international requirements for a protected distress button, the SC-101 standard does not actually require this feature, whereas the IEC Class 'D' standard has specific requirements. From a small vessel operator's perspective, it's very important that this human-machine interface is properly defined so we are not inundated with false distress calls on channel 70.

RTCM has not touched the SC-101 standard for many years and it is not compliant with ITU recommendation 493. As an example, SC-101 requires the capability of an all-ships routine call, which is not permitted under ITU 493.

SC-101 fails to deal with environmental or electromagnetic compatibility issues, while the IEC Class 'D' standard has testing requirements for these important design features. In high RF environments found in most urban centers, receiver parameters such as blocking and RF immunity are important, even for pleasure craft.

SC-101 does not require a 2nd receiver for monitoring the DSC distress frequency and, when the receiver squelch is held open by a transmission or carrier, important DSC calls might be missed. The cost of implementing a 2nd receiver for channel 70 should not be a factor; it is very inexpensive to implement a receiver section with today's technology. If a complete FRS transceiver can be manufactured for under \$7, surely an important feature like a distress watchkeeping receiver would not be more expensive.

The European Union has already adopted the Class 'D' VHF-DSC standard. In today's global economy, maintaining a regional standard just increases the cost to the manufacturers, and these costs are in turn passed on to the recreational boating community. I would suggest we adopt the same IEC Class 'D' standard for any new VHF radio submitted to the Commission for type approval, perhaps allowing manufacturers a 6-month 'grace' period for radios currently in the design phase.

Respectfully submitted;

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